

Essential ISO 42001 Roles & Responsibilities Guide

Practical Insights for Lead Implementers, Teams & Organizations

1. Introduction

ISO/IEC 42001:2023 is the first international standard specifically dedicated to the management of artificial intelligence (AI) systems. Developed by the International Organization for Standardization (ISO) and the International Electrotechnical Commission (IEC), this standard provides a robust framework for organizations to establish, implement, maintain, and continually improve an AI management system. It addresses not only technical and operational aspects but also governance, ethics, risk management, and regulatory compliance within the AI domain.

One of the foundational requirements of ISO/IEC 42001:2023 is the clear definition of roles and responsibilities. Without explicit delineation, organizations risk miscommunication, gaps in accountability, and ultimately, non-compliance with the standard. Well-defined roles ensure that responsibilities are understood, processes are executed efficiently, and accountability is maintained at every level of the AI management system.

This guide is intended for:

- **Lead Implementers** who are responsible for driving the adoption and integration of ISO/IEC 42001:2023.
- **Compliance Managers** and **Legal Teams** tasked with ensuring regulatory alignment.

- **AI Project Teams** involved in the development and deployment of AI systems.
- **Senior Leadership** who must provide oversight and strategic direction.
- Any organization or team preparing for external audits or certification under ISO/IEC 42001:2023.

2. Key Roles in an AI Management System

Implementing ISO/IEC 42001:2023 requires the collaboration of multiple stakeholders, each with distinct responsibilities to ensure the effective governance and operation of AI systems. Below, we break down the primary roles, their purposes, key activities, and reporting structures within a compliant AI management system.

2.1 Lead Implementer

- **Purpose:** Acts as the project lead for implementing and maintaining the AI management system in line with ISO/IEC 42001:2023.
- **Key Activities:**
 - Develops the implementation roadmap, timelines, and resource allocation.
 - Coordinates cross-functional teams (IT, legal, HR, etc.).
 - Oversees the creation and maintenance of required documentation, policies, and procedures.

- Facilitates training and awareness programs on the standard's requirements.
- Monitors progress and reports on implementation status.
- **Accountability & Reporting Line:** Typically reports to a steering committee or senior management. The Lead Implementer may also act as the point of contact for auditors and external consultants.

Example: In a tech company, the Lead Implementer might be a senior project manager or an information security officer who has previously overseen ISO 27001 integration.

2.2 Top Management

- **Purpose:** Provides strategic guidance, resources, and support for the AI management system. Sets the tone for the organization's commitment to AI governance, risk management, and ethical considerations.
- **Key Activities:**
 - Approves the AI management system policy and objectives.
 - Allocates budget and resources necessary for implementation and maintenance.
 - Regularly reviews AI-related risks and opportunities.
 - Ensures integration of the AI management system with broader business objectives.

- Champions a culture of ethical and responsible AI use.
- **Accountability & Reporting Line:** Ultimately accountable to the board of directors or organizational owners. Top management receives reports from the Lead Implementer and other teams, and is responsible for driving continual improvement.

Example: The CEO or CTO reviews the AI risk register quarterly and chairs the AI ethics steering committee.

2.3 Internal Audit Team

- **Purpose:** Provides independent evaluation of the AI management system's effectiveness and compliance with ISO/IEC 42001:2023.
- **Key Activities:**
 - Plans and conducts regular internal audits of AI processes, controls, and documentation.
 - Identifies nonconformities and recommends corrective actions.
 - Monitors the implementation of corrective actions and verifies their effectiveness.
 - Prepares audit reports for management review.
- **Accountability & Reporting Line:** Reports functionally to the audit committee or top management to maintain objectivity and independence.

Example: An internal audit team might uncover that an AI model’s decision-making process lacks sufficient documentation, prompting a workflow update before an external audit.

2.4 Compliance/Legal Team

- **Purpose:** Ensures that the organization’s AI activities comply with applicable laws, regulations, and industry standards. Advises on risks related to regulatory changes and ethical considerations.
- **Key Activities:**
 - Monitors AI-related legal and regulatory developments (e.g., GDPR, AI Act).
 - Reviews and approves AI governance policies and contracts with vendors.
 - Conducts risk assessments and privacy impact assessments.
 - Provides guidance on handling data rights, intellectual property, and liability issues.
- **Accountability & Reporting Line:** Reports to the Chief Compliance Officer, General Counsel, or Legal Director. Works closely with the Lead Implementer and AI development teams.

Example: Before launching a new AI-powered product, the compliance team verifies that data processing aligns with international privacy regulations.

2.5 AI Development Team

- **Purpose:** Designs, develops, tests, and maintains AI systems and models in accordance with organizational policies and ISO/IEC 42001:2023 requirements.
- **Key Activities:**
 - Implements technical controls for transparency, fairness, and robustness in AI models.
 - Maintains comprehensive documentation for model training, testing, and deployment.
 - Collaborates with compliance and audit teams to address findings and recommendations.
 - Conducts regular assessments to ensure AI systems align with organizational values and legal requirements.
- **Accountability & Reporting Line:** Reports to the Head of AI or CTO. The team is accountable for delivering compliant, secure, and effective AI solutions.

Example: The AI development team may be tasked with integrating explainability features into an algorithm after receiving feedback from the internal audit team.

2.6 External Auditors/Consultants

- **Purpose:** Provide independent, third-party assessment of the AI management system for certification or improvement purposes. Offer expert guidance on best practices and emerging standards.
- **Key Activities:**
 - Conducts formal certification audits or readiness assessments.
 - Benchmarks organizational practices against ISO/IEC 42001:2023 and industry peers.
 - Issues findings, certification recommendations, and improvement actions.
 - Offers tailored advice to optimize policies, processes, and controls.
- **Accountability & Reporting Line:** Accountable to the certification body or client organization. Reports findings to senior leadership and, when relevant, to the board.

Example: An external consultant may help an organization prepare for certification by running mock audits and recommending enhancements to documentation and risk registers.

Assigning clear roles and responsibilities is essential for the successful implementation and ongoing management of an AI management system under ISO/IEC 42001:2023. By understanding the purpose, activities, and reporting structures of each key role,

organizations can foster collaboration, maintain accountability, and achieve both compliance and continuous improvement in their AI initiatives.

3. Detailed Responsibilities of the ISO 42001 Lead

Implementer

The ISO 42001 Lead Implementer holds a pivotal role in orchestrating the successful establishment and ongoing management of the AI management system. Their responsibilities span the full lifecycle of implementation, from initial planning to continuous improvement. Below is an expanded checklist covering each primary area of responsibility:

3.1 Planning & Design

The Lead Implementer initiates the project by developing a comprehensive implementation plan. This includes defining objectives, scope, timelines, resource allocation, and key milestones. Careful attention is given to ensuring alignment between organizational goals and the requirements of ISO/IEC 42001:2023. Design activities may involve mapping existing processes, identifying touchpoints for AI integration, and establishing foundational governance structures.

3.2 Gap Analysis & Risk Assessment

Conducting a systematic gap analysis is crucial. The Lead Implementer evaluates current policies, procedures, and controls against ISO 42001 requirements to identify areas

needing enhancement. Simultaneously, a risk assessment is performed to pinpoint potential ethical, technical, legal, and operational risks associated with AI deployment. This dual analysis informs prioritization and resource allocation for remediation activities.

3.3 Policy Drafting

Based on the findings from gap and risk assessments, the Lead Implementer collaborates with relevant stakeholders to draft and update policies that align with ISO 42001 standards. These may include AI ethics, data governance, transparency, accountability, and incident management policies. Drafts are circulated for input and refined based on feedback to ensure clarity, feasibility, and organizational buy-in.

3.4 Stakeholder Engagement

The Lead Implementer actively involves stakeholders from across the organization, including executive leadership, compliance, legal, IT, and business units. Engagement activities may comprise workshops, briefings, and feedback sessions to ensure that the system reflects diverse perspectives and operational realities. This ongoing dialogue is essential for fostering a culture of responsible AI use and for addressing concerns proactively.

3.5 Staff Training & Awareness

Building organizational competence is a cornerstone of effective AI management. The Lead Implementer develops and delivers targeted training programs tailored to different

roles, ensuring staff understand their responsibilities under the AI management system. Awareness campaigns may include presentations, e-learning modules, and regular communications highlighting best practices, policy updates, and lessons learned from audits or incidents.

3.6 Internal Audits & Reviews

To verify adherence and effectiveness, the Lead Implementer schedules and facilitates internal audits of AI processes and documentation. They coordinate with the internal audit team, ensure findings are documented, and oversee the follow-up of recommendations. Regular management reviews are held to assess overall system performance and to drive strategic improvement.

3.7 Corrective Actions & Continuous Improvement

Upon identification of nonconformities or areas for improvement—whether through audits, incidents, or stakeholder feedback—the Lead Implementer oversees the development, implementation, and monitoring of corrective actions. They champion a cycle of continuous improvement, leveraging metrics and lessons learned to refine policies, training, and technical controls over time.

3.8 Reporting to Top Management

Transparency and accountability are achieved through structured reporting. The Lead Implementer prepares periodic updates and comprehensive reports for top management, summarizing progress, risk status, audit outcomes, and improvement

initiatives. These reports inform decision-making at the highest level and ensure ongoing executive engagement in the AI management system.

By addressing each of these responsibilities methodically, the ISO 42001 Lead Implementer enables organizations to build, maintain, and evolve an AI management system that is both robust and responsive to changing regulatory, ethical, and business landscapes.

4. Skills & Competencies Matrix

When assembling an effective AI management team aligned with ISO/IEC 42001:2023, understanding the specific skills, competencies, and credentials required for each key role is essential. Below is a practical guide that outlines the technical expertise, recommended certifications, and soft skills necessary for accountability, collaboration, and sustained excellence across the principal AI governance functions.

4.1 Compliance & Legal Team

- **Technical Skills:** Deep knowledge of data privacy laws (GDPR, CCPA), regulatory requirements, and risk management frameworks. Familiarity with AI-specific legal implications and compliance monitoring tools.
- **Recommended Certifications/Training:** Certified Information Privacy Professional (CIPP), Certified Information Systems Auditor (CISA), participation in AI ethics workshops, and ongoing legal education.

- **Soft Skills:** Strong analytical reasoning, attention to detail, clear communication, and the ability to explain complex regulations to non-specialists. Effective negotiation and collaboration with cross-functional teams are also essential.

4.2 AI Development Team

- **Technical Skills:** Expertise in machine learning, data engineering, model evaluation, and algorithm design. Proficiency with programming languages such as Python or R, and experience using AI development frameworks and tools.
- **Recommended Certifications/Training:** Certifications such as TensorFlow Developer Certificate, Microsoft Certified: Azure AI Engineer Associate, or participation in ISO/IEC 42001:2023 implementation workshops. Ongoing training in responsible AI and model explainability is highly encouraged.
- **Soft Skills:** Critical thinking, creativity in problem-solving, adaptability, and proactive communication. The ability to work collaboratively with legal, compliance, and audit teams is key for addressing interdisciplinary challenges.

4.3 External Auditors/Consultants

- **Technical Skills:** Auditing experience, deep understanding of AI management systems, and familiarity with international standards such as ISO/IEC 42001:2023. Capability to benchmark processes and identify best practices.

- **Recommended Certifications/Training:** ISO Lead Auditor certifications (e.g., ISO/IEC 27001, ISO/IEC 42001), Certified Internal Auditor (CIA), and ongoing professional development in AI governance.
- **Soft Skills:** Objectivity, impartiality, effective interviewing, and report writing. Ability to offer constructive feedback and provide clear, actionable recommendations tailored to the organization's context.

4.4 ISO 42001 Lead Implementer

- **Technical Skills:** Project management, policy development, risk analysis, and a strong grasp of both AI technologies and the ISO/IEC 42001:2023 standard. Experience mapping business processes and designing governance structures.
- **Recommended Certifications/Training:** Certified ISO/IEC 42001 Lead Implementer, Project Management Professional (PMP), and relevant AI ethics training.
- **Soft Skills:** Leadership, stakeholder management, facilitation, and excellent written and verbal communication skills. The Lead Implementer must inspire organizational buy-in, navigate competing priorities, and promote a culture of continuous improvement.

By referencing these skills and qualifications for each role, organizations can benchmark their teams and prioritize targeted development, ensuring the right mix of technical depth, ethical grounding, and collaborative agility for robust AI governance.

5. Practical Templates & Tools

5.1 Roles & Responsibilities Matrix Template (RACI Chart)

A RACI (Responsible, Accountable, Consulted, Informed) matrix is a simple yet powerful tool for clarifying who does what within your AI management system. Here's a sample template tailored for ISO/IEC 42001:2023 implementation:

Activity	Lead	Compliance	&AI	Executive	External
	Implementer	Legal	Development	Sponsor	Auditor
Gap Assessment	R/A	C	C	I	C
Policy Development	R	C/A	C	I	I
Risk Assessment	R	A/C	C	I	C
Staff Training	R/A	C	C	I	I
Internal Audit	C	C	C	I	R/A
Management Review	C	C	I	A/R	I

- **R** = Responsible (does the work)
- **A** = Accountable (owns the outcome)
- **C** = Consulted (provides input)
- **I** = Informed (kept up to date)

5.2 Example Job Description Snippet: ISO 42001 Lead Implementer

Position Summary: The ISO 42001 Lead Implementer drives the design, deployment, and continuous improvement of the organization's AI management system in alignment with ISO/IEC 42001:2023. This individual leads cross-functional teams, ensures regulatory compliance, and fosters a culture of responsible AI use.

- **Key Responsibilities:**
 - Develop and execute project plans for ISO 42001 implementation
 - Conduct gap analyses and risk assessments
 - Draft and update AI governance policies
 - Facilitate stakeholder engagement and training
 - Coordinate audits, management reviews, and corrective actions
 - Report regularly to executive leadership on progress and risks

- **Required Qualifications:**
 - Experience with ISO management systems (e.g., 27001, 9001, 42001)
 - Strong project management skills (PMP, Agile certifications a plus)
 - Proficiency in AI technologies and risk management
 - Excellent communication and leadership abilities

5.3 Tips for Delegating Tasks & Aligning Cross-Functional Teams

- Leverage clear RACI matrices to assign ownership and avoid ambiguity.
- Hold regular cross-team sync meetings to share updates and surface concerns early.
- Empower team leads to cascade information and clarify expectations within their domains.
- Use project management tools for tracking deliverables, deadlines, and dependencies.
- Celebrate milestones and recognize contributions from all functions to build engagement.

6. Best Practices & Pitfalls to Avoid

6.1 Common Mistakes During Role Definition

- Assigning overlapping or unclear responsibilities
- Leaving critical functions (e.g., internal audit or legal review) without clear owners
- Failing to update role assignments as the organization or technology evolves

6.2 Tips for Clear Communication & Accountability

- Document roles, responsibilities, and reporting lines—make them accessible and visible
- Set up regular check-ins for feedback, clarification, and progress tracking
- Use consistent language and definitions across all documentation and training materials

6.3 How to Review & Update Roles Regularly

- Schedule periodic reviews (e.g., quarterly or post-audit) of your RACI and org charts
- Solicit input from stakeholders on what's working and what's not
- Adjust assignments as workflows, regulations, or business priorities shift

7. Next Steps & Resources

- Apply this guide as a reference when structuring your AI management team and defining key roles.
- Start with a gap assessment to identify current strengths and weaknesses in your AI governance framework.
- Engage relevant departments early for input and buy-in; schedule internal training to build awareness and competence.
- Establish or update your RACI matrix and job descriptions to reflect the latest requirements of ISO/IEC 42001:2023.
- Consider external support (consultants, trainers, or certification partners) for complex implementations or audits.
- For more detailed resources, sample templates, or to inquire about training and certification options, visit our website or contact our team directly.

8. Conclusion

Effective role definition and accountability are foundational to a successful AI management system under ISO/IEC 42001:2023. By leveraging practical tools such as RACI matrices, articulated job descriptions, and robust cross-functional collaboration, organizations can ensure responsible AI governance that adapts to evolving risks and opportunities. Regularly reviewing and refining roles ensures alignment with regulatory

requirements and business goals, while empowering teams to maintain excellence and drive continuous improvement. For further support, consult the additional resources provided or reach out for tailored guidance as you embark on your ISO 42001 journey.

CERTIFIED ISO 42001:2023 LEAD IMPLEMENTER

Certified ISO 42001 Lead Implementer:
Mastering AI Management System
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